

Alyssa A. Qualls (IL Bar No. 6292124)
Email: quallsa@sec.gov
Amy S. Cotter (IL Bar No. 6238157)
Email: cottera@sec.gov
Raven A. Winters (IL Bar No. 6291077)
Email: wintersr@sec.gov

Attorneys for Plaintiff
Robert J. Burson, Associate Regional Director
Amy S. Cotter, Assistant Regional Director
Alyssa A. Qualls, Regional Trial Counsel
Securities and Exchange Commission
175 West Jackson Blvd., Suite 900
Chicago, Illinois 60604
Telephone: (312) 353-7390
Facsimile: (312) 353-7398

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DAVID B. KAPLAN, ESQ.,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda Du

**STIPULATION FOR ENTRY OF FINAL
JUDGMENT AGAINST RELIEF
DEFENDANT LISA M. KAPLAN**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as follows:

1 1. The United States Securities and Exchange Commission (the “Commission”) and
2 Relief Defendant Lisa M. Kaplan (“Relief Defendant,” and together with the Commission, the
3 “Parties”) jointly move this Court to enter final judgment against Relief Defendant. The Parties
4 have reached a settlement, and jointly move this Court to enter the proposed final judgment and
5 resolve this matter.

6 2. The Parties have reached a settlement to resolve all claims against Relief Defendant.
7 The settlement includes: (1) disgorgement; and (2) prejudgment interest.

8 3. A proposed final judgment as to Relief Defendant is attached as Exhibit A. Among
9 other things, the proposed final judgment orders Relief Defendant to pay disgorgement in the
10 amount of \$340,764.75, plus prejudgment interest thereon in the amount of \$26,762.65.

11 4. Relief Defendant shall partially satisfy this obligation through the transfer of
12 balances held in the frozen accounts after entry of this Final Judgment, as set forth in sections II to
13 V of Exhibit A.

14 5. Without either admitting or denying the allegations of the complaint in this action,
15 Relief Defendant has consented to the entry of the proposed final judgment, as reflected in the
16 Consent attached as Exhibit B.

17 6. The settlement brings the litigation to a close, without the need for a trial, and thus
18 conserves the resources of the Court and the Parties.

19 7. The Parties agree that entry of the proposed final judgment is in the public interest,
20 and is a fair and reasonable resolution of this matter. *See SEC v. Citigroup Global Markets, Inc.*,
21 752 F.3d 285 (2d Cir. 2014).

22 8. The Parties respectfully request the entry of final judgment at the Court’s earliest
23 convenience.
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1 WHEREFORE, for the foregoing reasons, the parties jointly move this Court for entry of
2 final judgment against Relief Defendant.

3 Date: January 8, 2018
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5 /s/ Alyssa A. Qualls
Alyssa A. Qualls (IL Bar No. 6292124)
6 175 West Jackson Blvd., Suite 1450
Chicago, Illinois 60604
7 Telephone: (312) 353-7390
8 Facsimile: (312) 353-7398
Email: quallsa@sec.gov

/s/ Lisa M. Kaplan
Lisa M. Kaplan
1314-B Cave Rock Drive
Glenbrook, NV 89413
Telephone: (509) 263-4625

9 Counsel for Plaintiff United States Securities
10 and Exchange Commission
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12 IT IS SO ORDERED:

13 _____
14 The Honorable Miranda Du
United States District Judge

Dated: _____